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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
LTL MANAGEMENT LLC, <sup>1</sup>	:	Case No. 23-12825
	:	
Debtor.	:	
	:	

**APPLICATION FOR ADMISSION *PRO HAC VICE* OF EMIL A. KLEINHAUS**

I, Steven M. Abramowitz, am a partner with the law firm Vinson & Elkins LLP and am a member in good standing of the bar of this Court. My New Jersey attorney registration number is 043641990. Pursuant to Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Procedure for the District of New Jersey (the “Local Bankruptcy Rules”), I move for the *pro hac vice* admission of Emil A.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Kleinhaus to practice in this Court for the purpose of representing Cyprus Amax Minerals Company as an interested party, in the above-captioned case. In support of this Application, the undersigned respectfully represents to the Court as follows:

1. Mr. Kleinhaus is a partner of the law firm of Wachtell, Lipton, Rosen & Katz, with his office located at 51 West 52nd Street, New York, New York 10019. Mr. Kleinhaus's telephone number is (212) 403-1332, and his facsimile number is (212) 403-2332. Mr. Kleinhaus's e-mail address is eakleinhaus@wlrk.com.

2. As stated in the *Certified Statement of Emil A. Kleinhaus in Support of Application for Admission Pro Hac Vice*, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Kleinhaus has been a member in good standing of the Bar of the State of New York since 2003 and is admitted to practice in the United States Supreme Court, the United States Court of Appeals for the Second Circuit, as well as the United States District Courts for the Southern District of New York and the Eastern District of New York. Further, as set forth in his Certified Statement, Mr. Kleinhaus is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.

3. With reference to all matters incident to this case, Mr. Kleinhaus submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the District of New Jersey for any alleged misconduct that occurs in the course of this chapter 11 case.

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Emil A. Kleinhaus to appear before the Court *pro hac vice* in this case.

Date: May 24, 2023

/s/ Steven M. Abramowitz

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